

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ABBOTT GMBH & CO., KG,)	
ABBOTT BIORESEARCH CENTER, INC.,)	
AND ABBOTT BIOTECHNOLOGY LTD.,)	C.A. No. 4:09-CV-11340 (FDS)
)	
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
CENTOCOR ORTHO BIOTECH, INC. AND)	
CENTOCOR BIOLOGICS, LLC.,)	
)	
Defendant.)	

**SUPPLEMENTAL DECLARATION OF ANGELA VERRECCHIO IN SUPPORT OF
CENTOCOR'S RELY MEMORANDUM ON THE ISSUE OF WILLFUL
INFRINGEMENT**

I, Angela Verrecchio, declare and state as follows:

1. I am counsel at the law firm Akin Gump Strauss Hauer and Feld LLP, counsel for Centocor Ortho Biotech, Inc. and Centocor Biologics, LLC, and as such I am familiar with the facts stated herein.
2. Attached hereto as Exhibit 10 is a true and correct copy of *Highmark, Inc. v. Allcare Health Mgmt. Sys., Inc.*, No. 2011-1219, 2012 U.S. App. LEXIS 16450 (Fed. Cir. 2012).
3. Attached hereto as Exhibit 11 is a true and correct copy of *Sargent Mfg. Co. v. Cal-Royal Prods.*, No. 3:08-cv-408 (VLB), 2012 U.S. Dist. LEXIS 105260 (D. Conn. July 27, 2012) .
4. Attached hereto as Exhibit 12 is a true and correct copy of *BASF Corp. v. Aristo, Inc.*, 2:07 CV 222 PPS, 2012 U.S. Dist. LEXIS 90768 (N.D. Ind. June 29, 2012).

5. Attached hereto as Exhibit 13 is a true and correct copy of a Memorandum Opinion of the USPTO Board of Patent Appeals and Interferences in Patent Interference No. 105,592 (August 6, 2009) bearing bates numbers COBI00610526-566.

6. Attached hereto as Exhibit 14 is a true and correct copy of a Press Release from PR Newswire “STELARA® Awarded 2011 Prix Galien USA in Best Biotechnology Product Category” dated September 28, 2011.

I declare under penalty of perjury that the foregoing is true and correct.

Date: September 4, 2012



Angela Verrecchio

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Supplemental Declaration of Angela Verrecchio in Support of Centocor's Reply Memorandum on the Issue of Willful Infringement along with exhibits cited therein was electronically mailed to counsel of record on September 4, 2012.



Angela Verrecchio